

**RICHARDS, LAYTON & FINGER**  
A PROFESSIONAL ASSOCIATION  
ONE RODNEY SQUARE  
920 NORTH KING STREET  
WILMINGTON, DELAWARE 19801  
(302) 651-7700  
FAX (302) 651-7701  
WWW.RLF.COM

ANNE SHEA GAZA  
COUNSEL

DIRECT DIAL NUMBER  
302-651-7539  
GAZA@RLF.COM

October 25, 2007

**VIA E-FILING**

The Honorable Sue L. Robinson  
United States District Court  
District of Delaware  
844 King Street  
Wilmington, DE 19801

**Re: Oracle Corp. v. epicRealm Licensing, L.P., Case No. 06-414-SLR  
QuinStreet, Inc. v. epicRealm Licensing, L.P., Case No. 06-495-SLR**

Dear Judge Robinson:

QuinStreet writes this letter to briefly outline the pending motions and discovery disputes between QuinStreet and Oracle and epicRealm in anticipation of next Monday's hearing.

With respect to QuinStreet's Motion for Leave:

**QuinStreet's Revised Motion for Leave to File Amended Complaint.** This motion is now fully briefed and the parties can address any issues the Court may have pertaining to the motion.

With respect to epicRealm:

**epicRealm's Response to QuinStreet's Proposal For Staged Discovery or Bifurcation.** This Court previously ordered a first stage of discovery requiring QuinStreet to produce configuration files and source code for its five identified software platforms by October 15, 2007. All such materials in QuinStreet's possession have been produced to epicRealm.

QuinStreet realizes that even given its production that epicRealm is not prepared to identify which platforms it accuses or to state why under the allegations of its counterclaim.

In order to avoid the issue of "who goes first" as this Court previously did by ordering a first stage of production, QuinStreet has proposed that discovery be further staged to complete infringement discovery before proceeding with damages discovery.

The Honorable Sue L. Robinson  
October 25, 2007  
Page 2

**epicRealm's Production of Documents to QuinStreet.** As of the date document production was due, epicRealm had not produced any requested documents to QuinStreet.

**epicRealm's Response to Interrogatories of QuinStreet.** EpicRealm has not provided full and complete interrogatory answers including its contentions of infringement.

Respectfully,



Anne Shea Gaza  
(#4093)

ASG/afg

cc: Richard L. Horwitz, Esquire (via electronic mail and e-filing)  
Larry D. Carlson, Esquire (via electronic mail)  
Mary B. Graham, Esquire (via electronic mail and e-filing)  
James G. Gilliland, Esquire (via electronic mail)  
Robert Beiser, Esquire (via electronic mail)  
Ludwig Kohlman, Esquire (via electronic mail)  
David Doyle, Esquire (via electronic mail)  
Jeffrey L. Moyer, Esquire (via electronic mail)